

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re :

LEHMAN BROTHERS HOLDINGS INC., *et al.*, :

Debtors. :

Chapter 11 Case No.

08-13555 (JMP)

(Jointly Administered)  
-----X

**AFFIDAVIT AND DISCLOSURE STATEMENT OF ROBERT T. MOWREY,  
ON BEHALF OF LOCKE LORD BISSELL & LIDDELL LLP**

STATE OF TEXAS           §  
                                  §  
COUNTY OF HARRIS       §

Robert T. Mowrey, being duly sworn, upon his oath, deposes and says:

1. I am a partner with the law firm of Locke Lord Bissell & Liddell LLP, located at 2200 Ross Avenue Suite 2200, Dallas, Texas 75201 (the "Firm").

2. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the "Debtors" and, collectively with their non-debtor affiliates, Lehman Brothers Bank, F.S.B. and Aurora Loan Services LLC ("Lehman")), have requested that the Firm represent the Debtors in litigation involving loss recovery, and defense of claims related to the purchase, sale, transfer, servicing and securitization of mortgage loans. The Firm has consented to provide such services.

3. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of its customary practice, the Firm is retained

in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases.

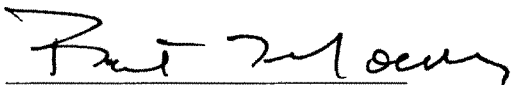
4. Neither I, nor any principal of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and regular employees of the Firm.

5. Neither I, nor any principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest adverse to the Debtors or their estates.

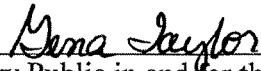
6. Currently the Firm represents the creditors in the following adversary proceedings: (1) Southern Community Financial Corporation and Southern Community Bank and Trust (Case No. 08-01744 (JMP)); and (2) Carolina First Bank (Case No. 08-01745 (JMP)). However, both adversary proceedings are against Lehman Brothers Special Financing, Inc. and the Firm does not represent nor intend to represent any parties adverse to Lehman Brothers Holdings Inc. or Aurora Loan Services LLC. None of the above-referenced actions involve the kind of matters or fall within the scope of the type of work for which the Firm has been retained by the Debtors to represent them.

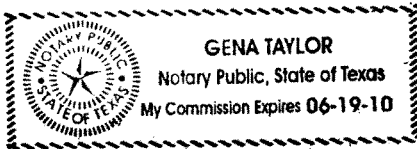
7. The Debtors owe the Firm approximately \$40,693.96 for prepetition services.

8. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Affidavit if necessary.

By:   
ROBERT T. MOWREY

Subscribed and sworn to before me  
this 11<sup>th</sup> day of February 2009

  
Notary Public in and for the  
State of Texas



**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	
-----X		

**RETENTION QUESTIONNAIRE**

TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY LEHMAN BROTHERS HOLDINGS INC. OR ANY OF ITS DEBTOR AFFILIATES (collectively, the "Debtors")

**DO NOT FILE THIS QUESTIONNAIRE WITH THE COURT.**  
**RETURN IT FOR FILING BY THE DEBTORS, TO:**

Weil, Gotshal & Manges LLP  
767 Fifth Avenue  
New York, New York 10153  
Attn: Jennifer Sapp  
Christopher Stauble

All questions **must** be answered. Please use "none," "not applicable," or "N/A," as appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of firm:

Locke Lord Bissell & Liddell LLP (the "Firm")

2200 Ross Avenue Suite 2200

Dallas, Texas 75201

2. Date of retention: August 2008

3. Type of services provided (accounting, legal, etc.): Legal services and  
litigation services.

4. Brief description of services to be provided:

The Firm's representation will involve litigation regarding loss recovery, and defense of claims related to the purchase, sale, transfer, servicing and securitization of mortgage loans.

5. Arrangements for compensation (hourly, contingent, etc.)

Hourly

- (a) Average hourly rate (if applicable):

Approximately \$344.00

- (b) Estimated average monthly compensation based on prepetition retention (if firm was employed prepetition):

Approximately \$10,000.00

6. Prepetition claims against the Debtors held by the firm:

Amount of claim: Approximately \$40,693.96

Date claim arose: Mainly for ongoing litigation matters

Source of Claim: Litigation services

7. Prepetition claims against the Debtors held individually by any member, associate, or professional employee of the firm:

Name: NA

Status: NA

Amount of Claim: NA

Date claim arose: NA

Source of claim: NA

8. Stock of the Debtors currently held by the firm:

Kind of shares: NA

No. of shares: NA

9. Stock of the Debtors currently held individually by any member, associate, or professional employee of the firm:

Name: Gina Coburn

Status: Legal secretary

Kind of shares: Common stock of Lehman Brothers Holdings

No. of shares: 2500 shares

10. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates with respect to the matters on which the above-named firm is to be employed.

Currently the Firm represents the creditors in the following adversary proceedings: (1) Southern Community Financial Corporation and Southern Community Bank and Trust (Case No. 08-01744 (JMP)); and (2) Carolina First Bank (Case No. 08-01745 (JMP)). However, both adversary proceedings are against Lehman Brothers Special Financing, Inc. and the Firm does not represent nor intend to represent any parties adverse to Lehman Brothers Holdings Inc. or Aurora Loan Services LLC. None of the above-referenced actions involve the kind of matters or fall within the scope of the type of work for which the Firm has been retained by the Debtors to represent them.

11. Name of individual completing this form:

Robert T. Mowrey